

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
JOANNE INC., et al. ¹)	Case No. 25-10068 (CTG)
)	(Jointly Administered)
Debtors.)	Related to Docket No. <u>1051</u>
)	

**DECLARATION OF JOSEPH F. MORRIS IN SUPPORT OF
DMC CORPORATION'S RESPONSE AND OBJECTION TO DEBTORS' FIRST
OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)**

I, Joseph F. Morris, pursuant to 28 U.S.C. §1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I am Finance Director of Claimant DMC Corporation.
2. I submit this Declaration in support of the Response and Objection to the Debtors' First Omnibus Objection to Certain Claims (Substantive)(Reduced and Reclassified Claims, No Liability Claims, Reclassified Claims) [D.I. 1051].
3. On or about March 28, 2025, I filed a Proof of Claim alleging Debtors owed Claimant \$936,200.78 comprised of \$630,478.30 as a priority claim and \$305,722.48 as a general unsecured claim.
4. I hereby certify the following regarding Joanne's purchase orders, related DMC invoices and proof of delivery for DMC's goods and services were delivered to and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

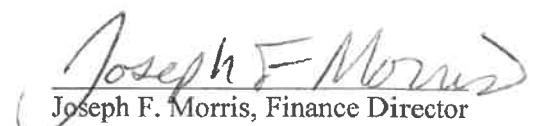
accepted by Joanne on December 30, 2024; January 3, 2025; and January 9, 2025, all within twenty (20) days prior to the commencement date, and as such are entitled to priority treatment under 11 U.S.C. § 503(b)(9) in the amount of \$630,478.30 as follows:

- a. On or about 12/30/2024 Joann submitted Purchase Order 017634475 for goods in the amount of \$58,896.00 to DMC which was delivered to Joann on 1/3/2025;
- b. On or about 12/30/2024 Joann submitted Purchase Order 0176344476 for goods in the amount of \$81,674.40 to DMC which was delivered to Joanne on 1/3/2025;
- c. On or about 12/30/2024 Joann submitted Purchase Order 0176344481 for goods in the amount of \$82,149.34 to DMC which was delivered to Joanne on 1/3/2025;
- d. On or about 12/30/2024 Joann submitted Purchase Order 0176044650 for goods in the amount of \$17,756.40 to DMC which was delivered to Joanne on 1/3/2025;
- e. On or about 12/30/2024 Joann submitted Purchase Order 0176044649 for goods in the amount of \$51,498.72 to DMC which was delivered to Joanne on 12/30/2024;
- f. On or about 12/30/2024 Joann submitted Purchase Order 0176344474 for goods in the amount of \$91,054.72 to DMC which was delivered to Joanne on 12/30/2024;
- g. On or about 12/30/2024 Joann submitted Purchase Order 0176344482 for goods in the amount of \$62,055.12 to DMC which was delivered to Joanne on 1/9/2025;

- h. On or about 12/30/2024 Joann submitted Purchase Order 0176344484 for goods in the amount of \$72,424.72 to DMC which was delivered to Joanne on 1/9/2025;
 - i. On or about 12/30/2024 Joann submitted Purchase Order 0176344483 for goods in the amount of \$93,531.08 to DMC which was delivered to Joanne on 1/9/2025; and
 - j. On or about 12/30/2024 Joann submitted Purchase Order 0176044651 for goods in the amount of \$19,437.80 to DMC which was delivered to Joanne on 1/9/2025.
5. I further certify that Joanne's purchase orders and related DMC invoices for goods and services provided to Joanne represent the general unsecured portion of DMC's claim in the amount of \$305,722.48 as follows:
- a. On or about 09/30/2024 DMC invoiced Joann for Purchase Order 0174234608 for goods in the amount of \$13,557.84;
 - b. On or about 09/30/2024 DMC invoiced Joann for Purchase Order 0174405629 for goods in the amount of \$43,133.74;
 - c. On or about 09/30/2024 DMC invoiced Joann for Purchase Order 0174234224 for goods in the amount of \$13,451.48;
 - d. On or about 09/30/2024 DMC invoiced Joann for Purchase Order 0174405827 for goods in the amount of \$27,137.26;
 - e. On or about 09/30/2024 DMC invoiced Joann for Purchase Order 0174234686 for goods in the amount of \$19,281.62;
 - f. On or about 09/30/2024 DMC invoiced Joann for Purchase Order 0174406085

- for goods in the amount of \$56,855.56;
- g. On or about 10/22/2024 DMC invoiced Joann for Purchase Order 0175306163 for goods in the amount of \$40,025.46;
 - h. On or about 10/23/2024 DMC invoiced Joann for Purchase Order 0175311791 for goods in the amount of \$44,203.62;
 - i. On or about 10/23/2024 DMC invoiced Joann for Purchase Order 0175309967 for goods in the amount of \$40,971.54;
 - j. On or about 10/24/2024 DMC invoiced Joann for Purchase Order 0174921118 for goods in the amount of \$170.64;
 - k. On or about 10/24/2024 DMC invoiced Joann for Purchase Order 0174921215 for goods in the amount of \$318.60;
 - l. On or about 10/31/2024 DMC invoiced Joann for Purchase Order 0175706257 for goods in the amount of \$3,571.56;
 - m. On or about 10/31/2024 DMC invoiced Joann for Purchase Order 0175706378 for goods in the amount of \$2,267.40; and
 - n. On or about 10/31/2024 DMC invoiced Joann for Purchase Order 0175705138 for goods in the amount of \$776.16.
6. True and correct copies of all purchase orders and documents supporting Proof of Claim are attached to Claimant's Response to Omnibus Objection as **Exhibit "A"** filed contemporaneously hereto.
 7. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 19th day of June, 2025.


Joseph F. Morris, Finance Director
DMC Corporation/The Dollfus Mieg
Company, Inc.